Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
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RE: DELETE, DELETE, DELETE	)	GN Docket No. 25-133
	)	
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COMMENTS OF THE SATELLITE INDUSTRY ASSOCIATION

The Satellite Industry Association ("SIA")[1] provides these comments in response to the Public Notice released by the Federal Communications Commission ("FCC" or "Commission") on March 12, 2025. The Public Notice seeks comment on identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens. More specifically, the Public Notice asks commenters to identify "rules that the commenting party believes should be repealed (or modified) and the rationale for [its] recommended action."

SIA appreciates the FCC's leadership in initiating this important information-gathering exercise for reducing regulatory burdens on licensees. While we understand that there are procedures under which the Commission may consider rule changes without describing those potential rule changes in advance (e.g., without a notice of proposed rulemaking published in the

[1] SIA Executive Members include: Amazon; Comtech; DIRECTV; EchoStar Corporation; Eutelsat Group; HawkEye 360; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Planet Labs PBC; SES Americom, Inc.; Spire Global Inc.; and Viasat Inc. SIA Associate Members include: ABS US Corp.; The Aerospace Corporation; Artel, LLC; AST Space Mobile; Astranis Space Technologies Corp.; The Boeing Company; Eutelsat America Corp + OneWeb Technologies; ExoAnalytic Solutions; Integrasys; Kinematics; Kymeta Corporation; Omnispace; Ovzon; Panasonic Avionics Corporation; Skyloom; and Telesat.

Federal Register), those procedures require "good cause," existing only in narrow circumstances (5 U.S.C. §§ 553(4)(B) and 553(d)(3)), and satellite regulation is complex and warrants a robust rulemaking process (*e.g.,* the issuance of potentially multiple notices of proposed rulemaking), consistent with the Commission's obligation under the Administrative Procedure Act and more general principles of due process. SIA appreciates the opportunity to provide these comments with that objective in mind.

As an initial matter, SIA notes that it has previously provided inputs in connection with Commission proceedings seeking to streamline Part 25 of the Commission's rules and related procedures thereunder. SIA incorporates by reference its previous recommendations and urges the Commission to follow them to the extent they have not yet been fully implemented.[2]

For example, SIA's previous comments ask the Commission to eliminate the requirement to provide emission designators in applications filed with the Space Bureau (*e.g.,* in the Schedules to FCC Form 312). Emission designators are a constant source of confusion and potential errors, and result in unnecessary delay. They are no longer used by the Office of Engineering and Technology, and substantially extend the length and complexity of applications—and the length of the weekly public notices of applications accepted for filing and applications granted—without providing any meaningful information. SIA members are not aware of any instance where a third party filed comments or a petition to deny based on emission designators. Instead, the Commission should simply include on its application forms a check box certifying that the applicant is only utilizing authorized emissions. Requiring more than this is simply unnecessary and counterproductive.

[2] *See, e.g.,* Comments of the Satellite Industry Association, IB Docket Nos. 22-411 and 22-271 (Mar. 3, 2023).

The Commission can also minimize unnecessary regulatory burden and delay by streamlining procedures that impact applicants' ability to obtain licenses in a timely fashion. The coordination processes between commercial and government users in shared bands that were established before the new space era have broken under the weight of rapidly increasing commercial space activity. While these processes cannot be "deleted" in their entirety because coordination continues to play an important role in preventing harmful interference among federal and non-federal satellite systems, they can be streamlined and made more effective. Thus, for example, the Commission should reexamine the need for and expectations around "pre-coordination" between commercial operators and NTIA and the federal government spectrum users in shared bands. This process is neither clear nor publicly documented in any detail. For operators, it is not clear when they should begin the process, what information they are required to submit, how long they should expect the process to take, or even what a successful outcome to pre-coordination looks like. If NTIA and federal spectrum managers would like to provide an option for operators to share preliminary information about their systems in advance of their FCC filing, industry continues to welcome that opportunity. But this should have no bearing on the formal coordination process that the FCC undertakes with NTIA and federal agencies before granting certain space or Earth station licenses for use of shared frequency bands.

The FCC can also help reform the lengthy and painful official inter-agency coordination process that often slows license approvals. First, it can routinely provide applications to NTIA for coordination when placed on public notice instead of waiting to send a draft grant much closer to the end of the process. This will allow NTIA and federal spectrum managers more time to consider the application and complete their coexistence analyses. Second, the FCC should also share the full application materials filed by the operator with NTIA so that federal agencies need

not pull them from ICFS or ask the applicant to provide a copy. Third, where NTIA requests conditions on a license grant on behalf of the federal agencies, the FCC should routinely share those draft license conditions with applicants and facilitate discussions with NTIA where conditions are unclear or may unduly burden the applicant. Such license conditions are increasingly burdensome and insufficiently justified and applicants should be afforded the opportunity to discuss and seek to revise them if appropriate.

SIA also believes that the Commission should avoid imposing new regulations where there is no demonstrable need to change the *status quo*. For example, the Commission is currently considering amending the Disaster Information Reporting System ("DIRS") procedures to require mandatory reporting by satellite providers when facilities are adversely impacted by a natural disaster.[3] The Commission should close this proceeding. Currently, DIRS reporting is voluntary for satellite providers and this has proven to be an effective solution.

Once again, SIA and its members appreciate the work of the FCC to promote innovation by eliminating unnecessary regulations. We look forward to continuing the discussion in the coming months.

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

/s/ Tom Stroup
Tom Stroup, President

April 11, 2025

[3] *Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, Second Report and Order and Second Further Notice of Proposed Rulemaking, 39 FCC Rcd 623 (1) (2024).